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May 17, 2021

BY ECF

Hon. Richard M. Berman
 United State District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: *United States v. Muge Ma*, 20 CR 407 (RMB)

Dear Judge Berman:

I am counsel to Mr. Ma in the above referenced case. I submit this letter on behalf of Mr. Ma regarding the current telephonic status conference scheduled for Wednesday, May 19, 2021. As Your Honor is aware, we have been working with the government on a plea agreement. We have come to terms. However, because of the difficulty in sending and receiving mail from the MCC, where Mr. Ma is housed, I do not yet have his signature on the plea agreement.

In addition, in preparing Mr. Ma for the plea colloquy, Mr. Ma has determined, for a variety of reasons, that he would like to plead in open court in person. If this is possible on this Wednesday, we would be able to appear in person. If it is not, we respectfully request a brief adjournment so that Your Honor can set an in person plea proceeding.

In the event that there is an adjournment, we respectfully request and consent that time be excluded under the Speedy Trial Act until the next conference date set by the Court pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial as it will allow time for the parties to continue our on-going discussions regarding a potential disposition of this matter. I have consulted with Assistant U.S. Attorney Sagar Ravi who consents to this potential adjournment request and to the exclusion of time on behalf of the government.

Thank you for your attention to this matter.

Application granted. In-person plea proceeding is scheduled for Thursday, June 3, 2021 at 11:30 AM. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.

Sincerely,

A handwritten signature in blue ink, appearing to be 'PK' or a stylized version of the name Peter Katz.

Peter Katz, Esq.
 Counsel to Muge Ma

SO ORDERED:

Date: 5/18/21

Richard M. Berman, U.S.D.J.